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Grand Rapids, Michigan

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

FOREMOST INSURANCE COMPANY,
GRAND RAPIDS, MICHIGAN,

Plaintiff

vs.

MATTHEW DINOPIA; RHODA TO
RECOVERY, LLC d/b/a JOURNEY TO
RECOVERY; MICHELLI KALTSAS;
CHARLESTON RESIDENTIAL SERVICES,
LLC d/b/a CROSSROADS OF SOUTHERN
NEVADA; CARLENA BROWN, as Statutory
Heir and as Co-Administrator to the ESTATE
of GEORGE MITCHELL, JR.; GEORGE
MITCHELL, as Statutory Heir and as Co-
Administrator to the ESTATE of GEORGE
MITCHELL, JR., and DOES 1 -10,

Defendants

Case No.: 2:25-cv-00334-CDS-MDC

**JOINT STIPULATION AND
ORDER TO EXTEND BRIEFING
SCHEDULE RE: DEFENDANT
CHARELSTON RESIDENTIAL
SERVICES, LLC'S MOTION TO
DISMISS (ECF 25)
[FIRST REQUEST]**

[ECF No. 28]

FOREMOST INSURANCE COMPANY, GRAND RAPIDS, MICHIGAN
("Foremost"), and CHARLESTON RESIDENTIAL SERVICES, LLC d/b/a CROSSROADS OF
SOUTHERN NEVADA ("Charleston") by and through their undersigned attorneys, hereby file
this Stipulation and [Proposed] Order to Extend the Briefing Schedule for Defendant
Charleston's Motion to Dismiss (ECF No. 25).

THE PARTIES HEREBY STIPULATE AND AGREE as follows:

1. Defendant Charleston filed its Motion to Dismiss (ECF No. 25) on May 30, 2025.

1 2. Pursuant to LR 7-2(b), and the Court's docket email, a response to Charleston's Motion
2 to Dismiss is due on June 13, 2025.

3 3. Counsel for the parties have communicated to discuss resolution of this matter, which
4 would eliminate the need for further briefing on Charleston's Motion to Dismiss, but are waiting
5 for client approval to determine how counsel may proceed to resolve this matter.

6 4. Pursuant to FRCP 6(b)(1), and LR 1A-61, the parties stipulate and request an extension
7 of 14 days from June 13, 2025 to June 27, 2025 for Foremost to file a response to Charleston's
8 Motion to Dismiss, and that, in turn, Charleston shall have an extension of 14 days after
9 Foremost's date to file, until July 11, 2025 to file a reply in support of the Motion.

10 5. This is the first request for an extension of time in this matter.

11 IT IS SO STIPULATED

12
13 DATED this 13th day of June, 2025.

14
15 /s/ Christian L. Moore, Esq.
16 Christian L. Moore, Esq., SBN #3777
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21 Attorneys for Plaintiff
22 Foremost Insurance Company,
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24 DATED this 13th day of June, 2025.

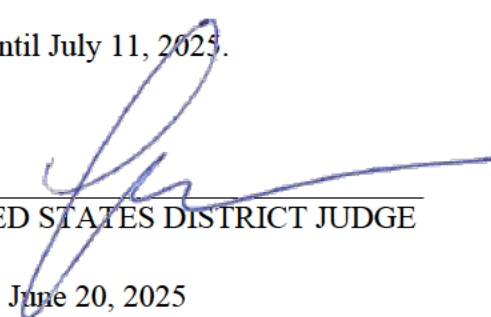
25 /s/ Lisa J. Zastrow, Esq.
26 Lisa J. Zastrow, Esq., SBN#9727
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28 9900 Convington Cross Drive, Suite 210
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Attorneys for Defendant Charleston
Residential Services, LLC d/b/a
Crossroads of Southern Nevada

ORDER

IT IS HEREBY ORDERED that:

1. The time for FOREMOST INSURANCE COMPANY, GRAND RAPIDS, MICHIGAN to file a response to the motion to dismiss (ECF No. 25) is extended from June 13, 2025 to June 27, 2025; and

2. The deadline for Charleston's reply in support of its motion to dismiss is extended fourteen days from Foremost's response, until July 11, 2025.


UNITED STATES DISTRICT JUDGE

Dated: June 20, 2025